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FARGO BANK, N.A.

Attorney for Defendant Wells Fargo Bank, N.A.

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

JANICE DARKO,

Plaintiff,

vs.

STIPULATION TO EXTEND DEADLINE
TO RESPOND TO COMPLAINT

Defendants.

THIS STIPULATION is entered into by and between Defendant Wells Fargo Bank, N.A. ("Wells Fargo") and Plaintiff Janice Darko ("Darko", and together with Wells Fargo, the "Parties"), by and through their respective counsel of record, to extend Wells Fargo's deadline to respond to Plaintiff's Complaint from May 22, 2025 until June 5, 2025 based on the following:

- 1. Plaintiff filed the Complaint on April 28, 2025.
- 2. Plaintiff served the Summons and Complaint on Wells Fargo on May 1, 2025.
- 3. Based on the date of service of the Summons and Complaint, Wells Fargo's current deadline to respond to the Complaint is May 22, 2025.
  - 4. Wells Fargo recently retained the undersigned counsel to represent it in this action.

**NOW, THEREFORE**, based on the foregoing and subject to Court approval, the Parties agree as follows:

1. The Parties stipulate and agree to extend the deadline for Wells Fargo to respond to the Complaint, up to and including **June 5**, **2025**, to allow Wells Fargo sufficient time to analyze and investigate the allegations in the Complaint, and to prepare a response thereto.

4923-7813-1268

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1	2. This extension request is sought in good faith and is not made for the purpose of	f
2	delay.	
3	IT IS SO STIPULATED.	
4		
5	Dated: May 19, 2025 Dated: May 19, 2025	
6	SNELL & WILMER L.L.P. LAW OFFICE OF KEVIN L. HERNANDEZ	
7	/s/ Jennifer B. Lustig /s/ Kevin L. Hernandez	_
8	Kelly H. Dove, Esq. Kevin L. Hernandez, Esq. Nevada Bar No. 10569 Nevada Bar No. 12594	
9	Jennifer B. Lustig, Esq. 8920 W. Tropicana Ave., Suite 101 Nevada Bar No. 9110 Las Vegas, NV 89147	
	1700 South Pavilion Center Drive, Ste. 700 Attorneys for Plaintiff Janice Darko	
10	Las Vegas, Nevada 89135  Attorneys for Defendant Wells Fargo Bank,	
11	N.A.	
12	ODDED	
13	<u>ORDER</u>	
14	Upon stipulation of the Parties, and good cause appearing therefor,	
15	IT IS HEREBY ORDERED that Defendant Wells Fargo Bank, N.A., shall have until Jun	e
16	5, 2025 to file a response to the Complaint.	
17	IT IS SO ORDERED.	
18	Dated: 5/20/2025	
19		
20	DANIEL J. ALBREGTS UNITED STATES MAGISTRATE JUDGE	
21		
22	Respectfully submitted by:	
	SNELL & WILMER L.L.P.	
23	/s/ Jennifer B. Lustig Kelly H. Dove, Esq.	
24	Nevada Bar No. 10569	
25	Jennifer B. Lustig, Esq. Nevada Bar No. 9110	
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1700 South Pavilion Center Drive, Ste. 700 Las Vegas, Nevada 89135 Attorneys for Defendant Wells Fargo Bank, *N.A.* 

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**CERTIFICATE OF SERVICE** 

I hereby certify that on May 19, 2025 I electronically filed the foregoing STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED May 19, 2025.

/s/ Joanna Fung An employee of SNELL & WILMER L.L.P